



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF HUMAN SERVICES  
LANSING



MAURA D. CORRIGAN  
DIRECTOR

February 24, 2014

Mr. Tom McMillin, State Representative  
Chair, House Oversight Committee  
45<sup>th</sup> District  
State Capitol  
PO Box 30014  
Lansing, Michigan 48909-7514

Dear Representative McMillin:

Enclosed is a schedule showing the status of audit finding corrective action implementation by the Department of Technology Management and Budget and the Department of Human Services for the following audit:

431-0591-12 Interface and Change Controls of the Bridges Integrated  
Automated Eligibility Determination System

The information is in response to your letter dated January 29, 2014.

Sincerely,

Maura D. Corrigan

Enclosure

**Office of Auditor General**  
**Performance Audit of Interface and Change Controls of the**  
**Bridges Integrated Automated Eligibility Determination System**

Findings and Corrective Action Summary, February 24, 2014

**Finding 01: Interface Processing Controls**

**Finding:** DHS and DTMB had not established effective processing controls over Bridges interfaces. As a result, DHS and DTMB cannot ensure that the data exchanged between Bridges and other information systems is processed accurately, completely, and timely.

**Response:** The Departments partially agree with the findings and related recommendations. Additional controls have been implemented to ensure that all interfaces run according to their schedule(s).

DTMB does not agree that records that are excluded from processing by the business rules approved and tested for a particular interface require further review. There would be no reason to resubmit these records as no correction was needed. In regards to the FISCAM standards mentioned in this report; these records did not create any errors or exceptions and are not the result of any problems encountered during interface processing.

**Corrective Action:** DHS and DTMB have implemented additional controls (e.g. daily, weekly, and monthly queries, etc.) to ensure that all interfaces run according to their schedules. DHS and DTMB have developed corrective action plans to improve the effectiveness of interface processing controls which include reviewing and updating development standards and improving QA testing for interfaces. In addition, exception handling standards, an analysis of interface exceptions, and list of recommended changes to the current procedures for interface development, testing and monitoring will be documented and communicated.

**Planned Implementation Date:** March 1, 2014

**Status: Partial Completion**

Actions completed to date include:

- DTMB created daily, weekly and monthly reports to ensure the interfaces are processed according to the schedule. The reports are reviewed on a monthly basis as of November 2013.
- DTMB completed the review of the development standards related to the batch framework tables to clearly define consistent rules for writing to the batch framework tables in December 2013.

Actions to be completed include:

- Coding will begin in April 2014 to make sure the tables have consistent information.

**Revised Date for Full Implementation:** July 1, 2014

**Finding 02: Monitoring of Bridges Processing**

**Finding:** DTMB management did not utilize system generated reports to effectively monitor Bridges processing. Without effective monitoring, DHS and DTMB cannot ensure that Bridges is operating as intended, cannot effectively isolate and correct performance problems, and cannot establish performance baselines to be used for future planning.

**Response:** DTMB partially agrees with the finding and recommendation. DTMB agrees that system generated reports could be beneficial to management; however, there are several dynamic factors that influence the manual report, it may not be cost-effective to automate this reporting. The corrective action plan will include a study of the feasibility of using system generated reports for this purpose.

**Corrective Action:** DTMB will perform feasibility study of using system generated reports for the monitoring of interface processing and focusing on the types of reports that could be automated. For each system generated report proposed, the following information will be provided: the objective of report, estimated cost and benefits, information to be included, the source, frequency and distribution, and identification of any currently manual tasks report would be replaced.

**Planned Implementation Date:** March 1, 2014

**Status: On Target**

DTMB will complete the feasibility study to use system generated reports and will meet the March 1, 2014 planned implementation date.

### **Finding 03: Bridges Operations Processing**

**Finding:** DTMB had not fully established and documented formal procedures for Bridges operations, including interface scheduling and processing. A lack of documented procedures increases the risk of interface processing errors and rework because of misunderstandings of procedures.

**Response:** DTMB agrees with the finding and recommendation.

**Corrective Action:** DTMB is reviewing, updating, and organizing established formal procedures for interface scheduling and processing; developing a Bridges Batch Scheduling and Operations Manual; and training of staff.

**Planned Implementation Date:** October 1, 2013

**Status: Partial Completion:**

Actions completed to date include:

- The Bridges batch development team and batch support team have combined all the related documents for the standards and processes.

Actions to be completed include:

- DTMB is completing the outline and final changes to the operations manual. The batch operations outline is in the review process.

**Revised Date for Full Implementation:** March 15, 2014

### **Finding 04: Interface Documentation**

**Finding:** DTMB, in conjunction with DHS, did not maintain complete interface design documentation. In addition, DTMB, in conjunction with DHS, did not ensure that all interface design documentation was stored in the Bridges version control tool, ClearCase. Incomplete or inaccessible documentation increases future maintenance costs and the dependency on knowledge held by key individuals.

**Response:** DTMB agrees with the finding and recommendation.

**Corrective Action:** DTMB has implemented controls within the peer review process to ensure that any modifications to a screen or interface are supported by an updated storyboard which includes data mappings, and that updated design and requirements documents are checked into the ClearCase (configuration management tool) documentation view at the time the code is checked in. In addition, interface storyboards will be updated and checked into ClearCase; design documents for future work requests will be checked into ClearCase and associated with the ClearQuest (defect tracking tool) activity that documents the approval for the change.

**Planned Implementation Date:** December 1, 2013

**Status: Implemented as Planned**

Corrective actions were completed in December 2013.

### **Finding 05: Data-Sharing Agreements**

**Finding:** DHS had not established data-sharing agreements with all State agencies that exchanged information with Bridges. As a result, DHS cannot ensure that appropriate safeguards have been established to protect the data in accordance with federal and State laws and regulations and State of Michigan policies.

The data sharing agreements noted in the finding were for the following interfaces:

BDOC01R - OTIS interface with Department of Corrections  
BDOC02R - OTIS interface with Department of Corrections  
BDLG10S - Wage Match interface with DELEG (LARA)  
BDLG10R - Wage Match interface with DELEG (LARA)

**Response:** DHS agrees with the finding and recommendation.

**Corrective Action:** DHS will continue to work with respective State agencies to ensure that current data-sharing agreements are in place for the four interfaces.

**Planned Implementation Date:** October 1, 2013

**Status: Partial Completion:**

Actions completed to date include:

- The data share agreement for the wage match interface was executed in October 2013.

Actions to be completed include:

- DHS continues to work with the Department of Corrections to complete the data share agreement for the OTIS interface.

**Revised Date for Full Implementation:** April 1, 2014

### **Finding 06: Bridges Change Controls**

**Finding:** DTMB, in conjunction with DHS, did not always comply with SUITE, contract provisions, and change control best practices. In addition, DTMB, in conjunction with DHS, did not ensure that the Bridges maintenance and support contract and the Bridges project management and technical support contract accurately reflected the contractors' responsibilities for Bridges change controls. Without improvements, DHS and DTMB cannot ensure that Bridges change processes are repeatable, planned, controlled, and monitored under all circumstances.

**Response:** The Departments partially agree with the findings and recommendations.

**Corrective Action:** DTMB and DHS are developing a plan to improve compliance with SUITE, contract provisions, and change control best practices.

**Planned Implementation Date:** February 1, 2014

**Status: Partial Completion:**

Actions completed to date include:

- DTMB and DHS developed an improved work request approval process that replaces the structured walkthrough. The process was implemented in November 2013.
- DTMB completed a repository of requirements to establish traceability in January 2014.
- The unit checklists have been integrated into an improved peer review process which was approved by DTMB and the contractor as of December 2013.
- DTMB published new standards for the post-implementation activities required for each release in January 2014.
- DTMB established detective controls to improve compliance with the Bridges' change control processes in January 2014.

- DTMB's Program Management Office conducted a quality assurance audit and reviewed the results with the contractor and DTMB management in August 2013.
- Actions to be completed include:
- DTMB will amend the project management technical support contract and the Bridges maintenance and support contract to accurately reflect the contractor's responsibilities.

**Revised Date for Full Implementation:** April 1, 2014

#### **Finding 07: ClearCase and ClearQuest Access**

**Finding:** DTMB had not established effective access controls over the Bridges version control tool, ClearCase, and the Bridges workflow tool, ClearQuest. DTMB used ClearCase and ClearQuest to control access to Bridges source code and promote changes to the Bridges application. As a result, there is an increased risk that changes to Bridges will not be developed and tested according to established procedures.

**Response:** DTMB agrees with the recommendation.

**Corrective Action:** DTMB has already implemented a number of corrective actions through server and client upgrades. Additional corrective actions include reviewing access controls, roles, groups, and using test databases.

**Planned Implementation Date:** October 1, 2013

**Status: Implemented but Past Planned Date**

DTMB reviewed the access controls, roles, groups and use of the test databases to ensure effective access controls over the Bridges version control tool in December 2013.

#### **Finding 08: Segregation of Duties**

**Finding:** DTMB had not established an appropriate segregation of duties over Bridges. Without an appropriate segregation of duties, there is an increased risk that unintended or unauthorized activities may occur and not be detected.

**Response:** DTMB partially agrees with the finding and recommendation.

**Corrective Action:** DTMB has started to evaluate and improve the effectiveness of controls over segregation of duties by reviewing access controls eliminating unnecessary service accounts.

**Planned Implementation Date:** October 1, 2013

**Status: Implemented but Past Planned Date**

DTMB completed its review of access controls and eliminating unnecessary service accounts in February 2014

#### **Finding 09: Bridges Configuration Management Plan**

**Finding:** DHS and DTMB had not updated the Bridges configuration management plan to include all information and processes required by the SUITE SEM. Updating the configuration management plan would help DHS and DTMB ensure that all enhancements and modifications to Bridges are properly developed and tested in accordance with State standards.

**Response:** DHS and DTMB agree with the recommendation.

**Corrective Action:** The departments have developed corrective action plans to update and align the configuration management plan to comply with the SUITE SEM objectives.

**Planned Implementation Date:** December 1, 2013

**Status: Partial Completion:**

Actions completed to date include:

- DTMB and DHS have drafted changes to the configuration management plan to comply with the SUITE SEM objectives.

Actions to be completed

- The configuration management plan is being finalized for internal review and when completed will include information and processes required by SUITE SEM.

**Revised Date for Full Implementation:** April 1, 2014